

Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Proposed

MAJOR FACILITY REVIEW PERMIT

Issued To:

Pechiney Plastic Packaging, Inc.
Facility #A0273

Facility Address:

6590 Central Avenue
Newark CA 94560

Mailing Address:

6590 Central Avenue
Newark CA 94560

Responsible Official

Dick Edgeworth, Plant Manager
(510) 797-3710

Facility Contact

Dave Harris, Technical Manager
(510) 797-3710

Type of Facility: Flexible Packaging Manufacturing

Primary SIC: 2671, 2754

Product: Flexible Packaging/Plastic Bottles

BAAQMD Permit Division Contact:

Dennis Jang

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Ellen Garvey, Executive Office/Air Pollution Control Officer

Date

Draft

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I. STANDARD CONDITIONS

A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions

(as amended by the District Board on 5/17/00);

SIP Regulation 1 - General Provisions and Definitions

(as approved by EPA through 8/27/99);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements

(as amended by the District Board on 5/17/00);

SIP Regulation 2, Rule 1 - Permits, General Requirements

(as approved by EPA through 2/25/99);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review

(as amended by the District Board on 5/17/00);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration

(as approved by EPA through 2/25/99);

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking

(as amended by the District Board on 5/17/00); and

SIP Regulation 2, Rule 4 - Permits, Emissions Banking

(as approved by EPA through 2/25/99).

BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review

(as amended by the District Board on 10/20/99).

B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit was issued on [] and expires on [when issued, enter 5th anniversary of issue date]. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than [when issued, enter date 6 months prior to permit expiration date] and no earlier than [when issued, enter date 12 months prior to expiration date]. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after** [when issued, enter 5th anniversary of issue date]. (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part

I. Standard Conditions

- 3, §4.11)
4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
 5. The filing of a request by the facility for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
 6. This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
 7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
 8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
 9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
 10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)

C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

D. Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

I. Standard Conditions

E. Records

Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

F. Monitoring Reports

All required monitoring reports must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. The first reporting period for this permit shall be [date of issuance] to [six months later]. The report shall be submitted by [one month after end of reporting period]. Subsequent reports shall be for the following periods: [_____ 1st through _____ 30th or 31st] and [_____ 1st through _____ 30th or 31st], and are due on the last day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent to the following address:

Director of Compliance and Enforcement
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

(Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be _____ 1st to _____ 30th or 31st. The certification shall be submitted by _____ 30th or 31st of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division
USEPA, Region IX
75 Hawthorne Street

I. Standard Conditions

San Francisco, CA 94105
Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

H. Emergency Provisions

1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)
2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit caused by conditions beyond the permit holder's reasonable control by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. Any variance granted by the Hearing Board from any term or condition of this permit which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)
3. Notwithstanding the foregoing, the granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement. (MOP Volume II, Part 3, §4.8)

I. Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

II. EQUIPMENT

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

S-#	Description	Make or Type	Model	Capacity
1	Rotogravure Coater at Extruder Laminator #11	Faustel	None	Unknown
2	Drying Oven at Extruder Laminator #11 (natural gas)	Faustel	None	600,000 BTU/hour
3	Flexographic Press P-2	Kidder	Centraflex 660	Unknown
4	Between-Color Drying Oven at Flexographic Press P-2 (natural gas)	Kidder Stacy	Unknown	600,000 BTU/hour
5	Overhead Oven at Flexographic Press P-2 (natural gas)	Kidder Stacy	Unknown	600,000 BTU/hour
6	Ink Decks #1 - #3 at 6-Color Flexographic Press P-3	Mark Andy	6120	Unknown
7	Ink Decks #4 - #6 at 6-Color Flexographic Press P-3	Mark Andy	4120	Unknown
11	Gravure Station #1 at Coater #14	Black Clawson	None	Unknown
12	Gravure Station #2 at Coater #14	Black Clawson	None	Unknown
13	Drying Oven #1 at Coater #14 (natural gas)	Black Clawson	None	600,000 BTU/hour
14	Drying Oven #2 at Coater #14 (natural gas)	Black Clawson	None	600,000 BTU/hour
15	Drying Oven #3 at Coater #14 (natural gas)	Black Clawson	None	600,000 BTU/hour
17	Primer Station #1 at Extruder Laminator #15	Guardian/Faustel	None	Unknown
18	Drying Oven #1 at Extruder Laminator #15 (natural gas)	Guardian	None	600,000 BTU/hour
19	Between-Color Dryers #1 - #3 at Press P-3 (electric)	Mark Andy	82	Unknown

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

S-#	Description	Make or Type	Model	Capacity
20	Between-Color Dryers #4 - #6 at Press P-3 (electric)	Mark Andy	82	Unknown

II. Equipment

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

S-#	Description	Make or Type	Model	Capacity
22	6-Color Flexographic Press P-4	NCF-4	None	Unknown
23	Drying Oven at Press P-4 (natural gas)	PCMC	None	600,000 BTU/hour
24	Primer Station #2 at Extruder Laminator #15	Inter-Roto	None	60 reams/hour
25	Drying Oven #2 at Extruder Laminator #15 (natural gas)	Inter-Roto	None	3 MM BTU/hour
26	Flexographic Press P-5 w/Between-Color Dryers and Tunnel Dryer (natural gas)	PCMC	6971	2.4 MM BTU/hour

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
2	Catalytic Oxidizer, Grace TEC Systems, Magnum 9	S-1 to S-7, S-11 to S-15, S-17 to S-20, S-24, S-25 & S-26	District Condition #14373, parts 1 & 2	Minimum operating temperature of 500°F	Minimum POC destruction of 97% by weight

III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full language of SIP requirements is included in Appendix A of this permit if the SIP requirement is different from the current BAAQMD requirement.

NOTE:

There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District's Rule Development Section of the Enforcement Division. All sources must comply with both versions of the rule until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (5/17/00)	N
SIP Regulation 1	General Provisions and Definitions (8/27/99)	Y
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y
BAAQMD Regulation 5	Open Burning (11/2/94)	N
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	N
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N

III. Generally Applicable Requirements

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (12/20/95)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (12/20/95)	N
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)	Y
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y

IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full language of SIP requirements is included in Appendix A of this permit if the SIP requirements are different from the current BAAQMD requirements. All other text may be found in the regulations themselves.

Table IV – A
Source-specific Applicable Requirements
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11
S-3 FLEXOGRAPHIC PRESS P-2
S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2
S-5 TUNNEL DRYER AT PRESS P-2
S-6 INK DECKS #1 - #3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-7 INK DECKS #4 - #6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-19 BETWEEN-COLOR DRYERS #1 - #3 AT PRESS P-3
S-20 BETWEEN-COLOR DRYERS #4 - #6 AT PRESS P-3

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/17/00)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	N	

IV. Source-specific Applicable Requirements

Table IV – A
Source-specific Applicable Requirements
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11
S-3 FLEXOGRAPHIC PRESS P-2
S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2
S-5 TUNNEL DRYER AT PRESS P-2
S-6 INK DECKS #1 - #3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-7 INK DECKS #4 - #6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-19 BETWEEN-COLOR DRYERS #1 - #3 AT PRESS P-3
S-20 BETWEEN-COLOR DRYERS #4 - #6 AT PRESS P-3

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-20-320	Solvent Evaporation Loss Minimization	Y	
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
8-20-505	Emission Control System Monitoring (temperature)	Y	
8-20-506	Emission Control System, Recordkeeping Requirements		
8-20-506.1	Current list of inks, coatings, adhesives, makeup solvent	Y	
8-20-506.2	Daily ink, coating, adhesive, solvent usage	Y	
8-20-506.3	Daily monitoring of system parameters	Y	
8-20-506.4	Record Retention	Y	
SIP Regulation 8, Rule 20	Organic Compounds – Graphic Arts Printing and Coating Operations (12/23/97)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements		
8-20-308	Approved Emission Control System	Y	
8-20-503	Records	Y	
8-20-503.1	Current list of inks, makeup solvent	Y	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		

IV. Source-specific Applicable Requirements

Table IV – A
Source-specific Applicable Requirements
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11
S-3 FLEXOGRAPHIC PRESS P-2
S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2
S-5 TUNNEL DRYER AT PRESS P-2
S-6 INK DECKS #1 - #3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-7 INK DECKS #4 - #6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-19 BETWEEN-COLOR DRYERS #1 - #3 AT PRESS P-3
S-20 BETWEEN-COLOR DRYERS #4 - #6 AT PRESS P-3

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.6(e)(1)(i)	Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	Correction of malfunctions	Y	
63.6(e)(3)(i)	Preparation of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(ii)	Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	General recordkeeping requirements	Y	
63.10(d)	General reporting requirements	Y	
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		
63.820(a)(2)(i)	Applicability; HAP Area Source Qualification	Y	
63.820(a)(2)(ii)	Applicability; HAP Area Source Qualification	Y	
63.829(d)	Recordkeeping Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
BAAQMD Condition #14373			
Part 1(c)	Minimum A-2 Catalytic Incinerator VOC Destruction Efficiency (basis: BACT)	Y	
Part 2	A-2 Catalytic Incinerator Capture Efficiency Interlock (basis: BACT)	Y	
Part 3	Allowable A-2 Catalytic Incinerator Operating Temperature (basis: BACT)	Y	
Part 4	A-2 Catalytic Incinerator Temperature Monitoring (basis: BACT)	Y	
Part 5	Allowable Temperature Excursions for A-2 Catalytic Incinerator (basis: Regulation 2-1-403)	Y	

IV. Source-specific Applicable Requirements

Table IV – A
Source-specific Applicable Requirements
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11
S-3 FLEXOGRAPHIC PRESS P-2
S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2
S-5 TUNNEL DRYER AT PRESS P-2
S-6 INK DECKS #1 - #3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-7 INK DECKS #4 - #6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-19 BETWEEN-COLOR DRYERS #1 - #3 AT PRESS P-3
S-20 BETWEEN-COLOR DRYERS #4 - #6 AT PRESS P-3

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 6	Recordkeeping for Allowable Temperature Excursions (basis: Regulation 2-1-403)	Y	

Table IV – B
Source-specific Applicable Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/17/00)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	N	
8-20-320	Solvent Evaporation Loss Minimization	Y	
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	

IV. Source-specific Applicable Requirements

Table IV – B
Source-specific Applicable Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
8-20-505	Emission Control System Monitoring (temperature)	Y	
8-20-506	Emission Control System, Recordkeeping Requirements		
8-20-506.1	Current list of inks, coatings, adhesives, makeup solvent	Y	
8-20-506.2	Daily ink, coating, adhesive, solvent usage	Y	
8-20-506.3	Daily monitoring of system parameters	Y	
8-20-506.4	Record Retention	Y	
SIP Regulation 8, Rule 20	Organic Compounds – Graphic Arts Printing and Coating Operations (12/23/97)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System	Y	
8-20-503	Records	Y	
8-20-503.1	Current list of inks, makeup solvent	Y	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		
63.6(e)(1)(i)	Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	Correction of malfunctions	Y	
63.6(e)(3)(i)	Preparation of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(ii)	Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	General recordkeeping requirements	Y	
63.10(d)	General reporting requirements	Y	
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		

IV. Source-specific Applicable Requirements

Table IV – B
Source-specific Applicable Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.820(a)(2)(i)	Applicability; HAP Area Source Qualification	Y	
63.820(a)(2)(ii)	Applicability; HAP Area Source Qualification	Y	
63.821(a)(3)(i) (C)	Designation of Affected Sources	Y	
63.829(d)	Recordkeeping Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
BAAQMD Condition #14373			
Part 1(c)	Minimum A-2 Catalytic Incinerator VOC Destruction Efficiency (basis: BACT)	Y	
Part 2	A-2 Catalytic Incinerator Capture Efficiency Interlock (basis: BACT)	Y	
Part 3	Allowable A-2 Catalytic Incinerator Operating Temperature (basis: BACT)	Y	
Part 4	A-2 Catalytic Incinerator Temperature Monitoring (basis: BACT)	Y	
Part 5	Allowable Temperature Excursions for A-2 Catalytic Incinerator (basis: Regulation 2-1-403)	Y	
Part 6	Recordkeeping for Allowable Temperature Excursions (basis: Regulation 2-1-403)	Y	

IV. Source-specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S-11 GRAVURE STATION #1 AT COATER #14
S-12 GRAVURE STATION #2 AT COATER #14
S-13 DRYING OVEN #1 AT COATER #14
S-14 DRYING OVEN #2 AT COATER #14
S-15 DRYING OVEN #3 AT COATER #14

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/17/00)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	N	
8-20-320	Solvent Evaporation Loss Minimization		
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
8-20-505	Emission Control System Monitoring (temperature)	Y	
8-20-506	Emission Control System, Recordkeeping Requirements		
8-20-506.1	Current list of inks, coatings, adhesives, makeup solvent	Y	
8-20-506.2	Daily ink, coating, adhesive, solvent usage	Y	
8-20-506.3	Daily monitoring of system parameters	Y	
8-20-506.4	Record Retention	Y	
SIP Regulation 8, Rule 20	Organic Compounds – Graphic Arts Printing and Coating Operations (12/23/97)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	Y	
8-20-308	Approved Emission Control System	Y	

IV. Source-specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S-11 GRAVURE STATION #1 AT COATER #14
S-12 GRAVURE STATION #2 AT COATER #14
S-13 DRYING OVEN #1 AT COATER #14
S-14 DRYING OVEN #2 AT COATER #14
S-15 DRYING OVEN #3 AT COATER #14

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-20-503	Records	Y	
8-20-503.1	Current list of inks, makeup solvent	Y	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		
63.6(e)(1)(i)	Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	Correction of malfunctions	Y	
63.6(e)(3)(i)	Preparation of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(ii)	Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	General recordkeeping requirements	Y	
63.10(d)	General reporting requirements	Y	
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		
63.820(a)(2)(i)	Applicability; HAP Area Source Qualification	Y	
63.820(a)(2)(ii)	Applicability; HAP Area Source Qualification	Y	
63.829(d)	Recordkeeping Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
BAAQMD Condition #14373			
Part 1(b)	Minimum A-2 Catalytic Incinerator VOC Destruction Efficiency (basis: BACT)	Y	
Part 3	Allowable A-2 Catalytic Incinerator Operating Temperature (basis: BACT)	Y	
Part 4	A-2 Catalytic Incinerator Temperature Monitoring (basis: BACT)	Y	

IV. Source-specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S-11 GRAVURE STATION #1 AT COATER #14
S-12 GRAVURE STATION #2 AT COATER #14
S-13 DRYING OVEN #1 AT COATER #14
S-14 DRYING OVEN #2 AT COATER #14
S-15 DRYING OVEN #3 AT COATER #14

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 5	Allowable Temperature Excursions for A-2 Catalytic Incinerator (basis: Regulation 2-1-403)	Y	
Part 6	Recordkeeping for Allowable Temperature Excursions (basis: Regulation 2-1-403)	Y	

IV. Source-specific Applicable Requirements

Table IV – D
Source-specific Applicable Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	Y	
8-20-309	Cleaning Product Requirements	Y	
8-20-320	Solvent Evaporation Loss Minimization		
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
SIP Regulation 8, Rule 20	Organic Compounds – Graphic Arts Printing and Coating Operations (12/23/97)		
8-20-503	Records	Y	
8-20-503.1	Current list of inks, makeup solvent	Y	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		
63.6(e)(1)(i)	Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	Correction of malfunctions	Y	
63.6(e)(3)(i)	Preparation of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(ii)	Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	General recordkeeping requirements	Y	

IV. Source-specific Applicable Requirements

Table IV – D
Source-specific Applicable Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.10(d)	General reporting requirements	Y	
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		
63.820(a)(2)(i)	Applicability; HAP Area Source Qualification	Y	
63.820(a)(2)(ii)	Applicability; HAP Area Source Qualification	Y	
63.829(d)	Recordkeeping Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
BAAQMD Condition #1955			
Part 1	Ink VOC content limitation (basis: cumulative increase)	Y	
Part 2	Ink, Solvent Usage Recordkeeping Requirement (basis: cumulative increase)		
Part 3	Daily and annual VOC mass emission limitation (basis: cumulative increase)	Y	
Part 4	Reports of exceedances (basis: 1-420)	Y	
Part 5	NPOC Usage Prohibition (basis: cumulative increase)	Y	

Table IV – E
Source-specific Applicable Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/17/00)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		

IV. Source-specific Applicable Requirements

Table IV – E
Source-specific Applicable Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	Y	
8-20-320	Solvent Evaporation Loss Minimization		
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
8-20-505	Emission Control System Monitoring (temperature)	Y	
8-20-506	Emission Control System, Recordkeeping Requirements		
8-20-506.1	Current list of inks, coatings, adhesives, makeup solvent	Y	
8-20-506.2	Daily ink, coating, adhesive, solvent usage	Y	
8-20-506.3	Daily monitoring of system parameters	Y	
8-20-506.4	Record Retention	Y	
SIP Regulation 8, Rule 20	Organic Compounds – Graphic Arts Printing and Coating Operations (12/23/97)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	Y	
8-20-308	Approved Emission Control System	Y	
8-20-503	Records	Y	
8-20-503.1	Current list of inks, makeup solvent	Y	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		
63.6(e)(1)(i)	Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	Correction of malfunctions	Y	
63.6(e)(3)(i)	Preparation of startup, shutdown and malfunction plan	Y	

IV. Source-specific Applicable Requirements

Table IV – E
Source-specific Applicable Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.6(e)(3)(ii)	Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	General recordkeeping requirements	Y	
63.10(d)	General reporting requirements	Y	
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		
63.820(a)(2)(i)	Applicability; HAP Area Source Qualification	Y	
63.820(a)(2)(ii)	Applicability; HAP Area Source Qualification	Y	
63.829(d)	Recordkeeping Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
BAAQMD Condition #14373			
Part 1(a)	Minimum A-2 Catalytic Incinerator VOC Destruction Efficiency (basis: BACT)	Y	
Part 3	Allowable A-2 Catalytic Incinerator Operating Temperature Range (basis: BACT)	Y	
Part 4	A-2 Catalytic Incinerator Temperature Monitoring (basis: BACT)	Y	
Part 5	Allowable Temperature Excursions for A-2 Catalytic Incinerator (basis: Regulation 2-1-403)	Y	
Part 6	Recordkeeping for Allowable Temperature Excursions (basis: Regulation 2-1-403)	Y	
Part 7	Primer, Coating, and Solvent Usage Recordkeeping Requirement (basis: cumulative increase)	Y	
Part 8	Limitation on Daily and Annual VOC emissions (basis: cumulative increase)	Y	
Part 9	Violation Reporting Requirement (basis: Regulation 1-420)	Y	
Part 10	Total Enclosure Requirement (basis: BACT)	Y	

IV. Source-specific Applicable Requirements

Table IV – F
Source-specific Applicable Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/17/00)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	Y	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	Y	
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		
63.820(a)(2)(i)	Applicability; HAP Area Source Qualification	Y	
63.820(a)(2)(ii)	Applicability; HAP Area Source Qualification	Y	
63.829(d)	Recordkeeping Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
BAAQMD Condition #15238			
Part 1	Limitation on Net VOC Usage from Waterborne Ink and Makeup Solvent (basis: cumulative increase)	Y	
Part 2	Limitation on Net VOC Usage from Solventborne Ink and Makeup Solvent (basis: cumulative increase)	Y	
Part 3	Limitation on Net Metallic Ink Usage (basis: cumulative increase)	Y	
Part 4	Limitation on Net Cleanup Solvent Usage (basis: cumulative increase)	Y	
Part 5	Limitation on Annual POC Emissions from Ink and Solvent Usage (basis: cumulative increase)	Y	
Part 6	Abatement Requirement (basis: cumulative increase)	Y	
Part 7	Minimum Overall A-2 Control Efficiency (basis: cumulative increase)	Y	
Part 8	A-2 Capture Efficiency Interlock (basis: BACT)	Y	
Part 9	Source Test Requirement (basis: cumulative increase)	Y	
Part 10	Waterborne Ink VOC Content Limitation (basis: cumulative increase)	Y	

IV. Source-specific Applicable Requirements

Table IV – F
Source-specific Applicable Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 11	Recordkeeping Requirement (basis: cumulative increase)	Y	

V. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

Condition #1955

for S-22 6-Color Flexographic Press P-4

1. This press shall not use any ink with a precursor organic compound (POC) content exceeding 25% by volume, as-applied. (basis: cumulative increase)
2. Daily usage records of inks, makeup solvent, and cleanup solvent shall be kept in a District approved log and maintained on site for at least five years from date of entry. These records shall contain the following:
 - a. date of record
 - b. name of each ink used
 - c. quantity of each ink used
 - d. amount of makeup solvent used for each ink
 - e. amount of cleanup solvent used
 - f. calculation of daily emissions(basis: cumulative increase)
3. Maximum volatile organic compound (VOC) emissions from this equipment, including all ink, makeup solvent, and cleanup solvent usage, shall not exceed 123 pounds per calendar day or 20,500 pounds per calendar year. (basis: cumulative increase)
4. If the daily or annual emission limitation in condition number 3 is exceeded, the applicant shall provide a written report to the District indicating the date of the violation and the resultant excess emissions. This report shall include the cause of the violation, and proposed future measures to assure that no further violations will occur. This report shall be submitted within ten days of the date of violation. (basis: District Regulation 1-420)
5. This source shall not use any non-precursor organic compounds in its operation. (basis: cumulative increase)

V. Permit Conditions

Condition #14373

For S-1, S-2, S-3, S-4, S-5, S-6, S-7, S-11, S-12, S-13, S-14, S-15, S-17, S-18, S-19, S-20, S-24, and S-25

1. A-2 Catalytic Incinerator shall maintain the following minimum VOC destruction efficiencies:
 - a. For sources S-24 and S-25: 97% (mass basis) when complying coatings (per Regulation 8-20-302) are not being used; (basis: cumulative increase)
 - b. For sources S-11, S-12, S-13, S-14, and S-15: 90% (mass basis) when complying coatings (per Regulation 8-20-302) are not being used; (basis: cumulative increase)
 - c. For sources S-1, S-2, S-3, S-4, S-5, S-6, S-7, S-17, S-18, S-19, and S-20: Overall collection and control efficiency of at least 75% (mass basis) when complying coatings (per Regulation 8-20-302) are not being used. (basis: 8-20-308)
2. The following requirement applies when non-complying materials are being used at S-1, S-2, S-3, S-4, S-5, S-6, S-7, S-17, S-18, S-19, or S-20. Complying materials are defined per Regulation 8-20-302:

Sources 1 through 7 and 17 through 20 shall be interlocked with A-2 Catalytic Incinerator so that the sources cannot operate in production mode unless A-2 is operating in compliance with condition 14373, parts 1(c), 3, and 4.

(basis: BACT)
3. The inlet catalyst cell temperature of A-2 Catalytic Incinerator shall be maintained at the an operating temperature of the most recent performance test where A-2 was demonstrated to be in compliance with condition 14373, part 1, except as allowed under condition 14373, part 5. range between 500 and 600 degrees Fahrenheit at all times. (basis: cumulative increase)
4. A continuous temperature recorder shall be installed and maintained to monitor ~~the~~ (a) A-2 catalyst inlet cell operating temperature and (b) ~~the temperature increase across A-2 catalyst bed.~~ (basis: cumulative increase)
5. The temperature limit in part 3 shall not apply during an “Allowable Temperature Excursion”, provided that the temperature controller setpoint complies with the temperature limit. An Allowable Temperature Excursion is one of the following and refers only to temperatures below the limit:

V. Permit Conditions

Condition #14373

For S-1, S-2, S-3, S-4, S-5, S-6, S-7, S-11, S-12, S-13, S-14, S-15, S-17, S-18, S-19, S-20, S-24, and S-25

- a. A temperature excursion not exceeding 20 degrees F; or
- b. A temperature excursion for a period or periods which when combined are less than or equal to 15 minutes in any hour; or
- c. A temperature excursion for a period or periods which when combined are more than 15 minutes in any hour, provided that all three of the following criteria are met.
 - i. the excursion does not exceed 50 degrees F;
 - ii. the duration of the excursion does not exceed 24 hours; and
 - iii. the total number of such excursions does not exceed 12 per calendar year (or any consecutive 12 month period).

Two or more excursions greater than 15 minutes in duration occurring during the same 24-hour period shall be counted as one excursion toward the 12-excursion limit. (basis: Regulation 2-1-403)

- 6. For each Allowable Temperature Excursion that exceeds 20 degrees F. and 15 minutes in duration, the Permit Holder shall keep sufficient records to demonstrate that they meet the qualifying criteria described above. Records shall be retained for a minimum of five years from the date of entry, and shall be made available to the District upon request. Records shall include at least the following information:
 - a. Temperature controller setpoint;
 - b. Starting date and time, and duration of each Allowable Temperature Excursion;
 - c. Measured temperature during each Allowable Temperature Excursion;
 - d. Number of Allowable Temperature Excursions per month, and total number for the current calendar year; and
 - e. All strip charts or other temperature records.

(basis: Regulation 2-1-403)
- 7. Daily usage records of primers, coatings, makeup solvent, and cleanup solvent used at source S-24 and S-25 shall be kept in an APCO approved log and maintained on-site for at least five years from date of entry. These records shall contain the following:
 - a. date of record
 - b. name of each primer or coating used
 - c. quantity of each primer or coating used

V. Permit Conditions

- d. amount of make-up solvent used

Condition #14373

For S-1, S-2, S-3, S-4, S-5, S-6, S-7, S-11, S-12, S-13, S-14, S-15, S-17, S-18, S-19, S-20, S-24, and S-25

- e. amount of cleanup solvent used
 - f. calculation of daily emissions
(basis: cumulative increase)
8. Maximum VOC emissions from sources S-24 and S-25, resulting from all coatings, primers, make-up solvent, and clean-up solvent usage shall not exceed 140 pounds per calendar day and 12.3 tons per calendar year. (basis: cumulative increase)
9. If any limitation specified in part 8 is exceeded, the permit holder ~~American National Can~~ shall provide a written report to the APCO indicating the date of the violation and the resultant excess emissions. This report shall include the cause of the violation and proposed future measures to assure that no further violations will occur. This report shall be submitted within two weeks of the date of violation. (basis: District Regulation 1-420)
10. Primer station #2 consisting of S-24 Line 15 Primer Station #2, and S-25 Line 15 2nd Coater Dryer shall have a total enclosure around the primer station during oxidizer abated operation. The enclosure will be considered "total" if the following criteria are met:
- a. Access doors and windows in the enclosure must be closed during oxidizer abated operation of the process.
 - b. The interior of the total enclosure must operate at a lower pressure than its surroundings so that air flows into the enclosure at all "natural draft openings" at all times during oxidizer abated operation of the process. A natural draft opening (NDO) is defined as an opening that is not connected to a duct in which a fan or blower is installed. An APCO approved pressure differential measuring device shall be installed to alert the process operators whenever the interior enclosure pressure is less than at least minus 0.02 inches of water pressure. The differential measuring device shall be installed to halt the application of solvent-containing compounds whenever the enclosure pressure is less than at minus 0.004 inches of water pressure. These differential pressures may be reset to other values with APCO approval.
 - c. The average velocity through all NDO's must be at least 200 feet/min. This velocity is calculated by dividing the difference between the rate of any forced air make-up air and exhaust rate by the total cross-sectional area of all NDO's. If the

V. Permit Conditions

Condition #14373

For S-1, S-2, S-3, S-4, S-5, S-6, S-7, S-11, S-12, S-13, S-14, S-15, S-17, S-18, S-19, S-20, S-24, and S-25

calculated average velocity is less than 500 feet/min, the continuity of the direction of air flow into the enclosure shall be determined.

- d. Any source of VOC emissions inside the enclosure must be at least four equivalent diameters (4 times the opening area divided by the perimeter) from each NDO.
- e. The total area of all NDO's shall be less than 5 percent of the surface area of the total enclosure's exterior walls, floor, and ceiling.
(basis: cumulative increase)

Condition #15238

For S-26

1. Net volatile organic compound (VOC) usage associated with waterborne ink and makeup solvent at S-26 shall not exceed ~~18,000~~ 6,000 pounds totaled over any consecutive twelve month period. (basis: cumulative increase)
2. Net volatile organic compound (VOC) usage associated with solventborne ink and makeup solvent usage at S-26 shall not exceed ~~198,750~~ 254,720 pounds totaled over any consecutive twelve month period. (basis: cumulative increase)
3. Net waterborne, metallic ink usage, prior to reduction with makeup fluid, at S-26 shall not exceed 2,000 pounds totaled over any consecutive twelve month period. (basis: cumulative increase)
4. Net organic cleanup solvent usage at S-26 shall not exceed ~~10,000~~ 8,000 pounds totaled over any consecutive twelve month period. (basis: cumulative increase)
5. Total precursor organic compound (POC) emissions due to ink and cleanup solvent usage at S-26 shall not exceed 39 tons totaled over any consecutive twelve month period. (basis: cumulative increase)
6. The between-color dryers and tunnel dryer associated with S-26 Flexographic Printing Press shall be abated by A-2 Catalytic Oxidizer whenever solventborne inks are applied at S-26. (basis: cumulative increase)

V. Permit Conditions

Condition #15238

For S-26

7. A-2 Catalytic Oxidizer shall achieve an overall (capture x destruction) POC control efficiency of 75% by weight when abating POC emissions from S-26. (basis: cumulative increase)
8. When solventborne materials are being used at S-26, it shall be interlocked with A-2 Catalytic Incinerator so that the printing press cannot operate in production mode unless A-2 is operating in compliance with condition 15238, parts 7.
(basis: BACT)
9. If deemed necessary by the APCO, the permit holder ~~American National Can Company~~ shall perform a District-approved source test of A-2 Catalytic Oxidizer while abating S-26 in accordance with part 6 to verify compliance with part 7. The permit holder ~~American National Can Company~~ shall submit a source test protocol to the District Permit Services Division at least two weeks prior to the planned source test date. (basis: cumulative increase)
10. The VOC content of waterborne inks (excluding metallic inks) applied at S-26 shall not exceed 1 pound per gallon, as applied. (basis: cumulative increase)
11. The owner/operator of S-26 shall maintain records of the following, VOC content and net usage on a monthly basis in a District-approved log:
 - a. ink, makeup solvent, and cleanup solvent type (waterborne, solventborne, metallic)
 - b. ink, makeup solvent, and cleanup solvent VOC content (pounds per gallon, as-supplied)
 - c. ink, makeup solvent, and cleanup solvent net usage (pounds per month)
 - d. total POC emissions (pounds per month)

These records shall be retained on site for a minimum of five years from the date of entry and made available to District representatives upon request.

(basis: cumulative increase, 2-6-501)

VI. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

Table VI – A
Applicable Limits and Compliance Monitoring Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11
S-3 FLEXOGRAPHIC PRESS P-2
S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2
S-5 TUNNEL DRYER AT PRESS P-2
S-6 INK DECKS #1 - #3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-7 INK DECKS #4 - #6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15
S-19 BETWEEN-COLOR DRYERS #1 - #3 AT PRESS P-3
S-20 BETWEEN-COLOR DRYERS #4 - #6 AT PRESS P-3

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-302	Y		1.25 lb VOC/gal of adhesive	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
VOC	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system

VI. Applicable Limits and Compliance Monitoring Requirements

Table VI – A
Applicable Limits and Compliance Monitoring Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11
S-3 FLEXOGRAPHIC PRESS P-2
S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2
S-5 TUNNEL DRYER AT PRESS P-2
S-6 INK DECKS #1 - #3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-7 INK DECKS #4 - #6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15
S-19 BETWEEN-COLOR DRYERS #1 - #3 AT PRESS P-3
S-20 BETWEEN-COLOR DRYERS #4 - #6 AT PRESS P-3

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 6.8 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
VOC	BAAQMD Condition #14373, part 1(c)	Y		75% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 4	C	Temperature Chart Recorder
VOC	BAAQMD Condition #14373, part 1(c)	Y		75% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system

VI. Applicable Limits and Compliance Monitoring Requirements

Table VI – A
Applicable Limits and Compliance Monitoring Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11
S-3 FLEXOGRAPHIC PRESS P-2
S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2
S-5 TUNNEL DRYER AT PRESS P-2
S-6 INK DECKS #1 - #3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-7 INK DECKS #4 - #6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15
S-19 BETWEEN-COLOR DRYERS #1 - #3 AT PRESS P-3
S-20 BETWEEN-COLOR DRYERS #4 - #6 AT PRESS P-3

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 3	Y		A-2 inlet catalyst cell temperature as established by most recent source test demonstrating compliance	BAAQMD Condition #14373 Part 4	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 5	Y		Allowable temperature excursion from A-2 operating temperature limit	BAAQMD Condition #14373 Part 6	P/M	Records of qualifying temperature excursions
HAP	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)(i)	Y		Facility Single HAP usage or emissions < 10 tons per rolling 12-month period	40 CFR Part 63, Subpart KK, Section 63.829(d)	P/M	Coating records
	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)(ii)	Y		Facility Combined HAP usage or emissions < 25 tons per rolling 12-month period	40 CFR Part 63, Subpart KK, Section 63.829(d)	P/M	Coating records

VI. Applicable Limits and Compliance Monitoring Requirements

Table VI - B
Applicable Limits and Compliance Monitoring Requirements
S-11 GRAVURE STATION #1 AT COATER #14
S-12 GRAVURE STATION #2 AT COATER #14
S-13 DRYING OVEN #1 AT COATER #14
S-14 DRYING OVEN #2 AT COATER #14
S-15 DRYING OVEN #3 AT COATER #14

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gallon of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-302	Y		1.25 lb VOC/gallon of adhesive	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 6.7 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
VOC	BAAQMD Condition #14373, Part 1(b)	Y		90% (wt) or greater VOC destruction efficiency	BAAQMD Condition #14373 part 4	C	Temperature Chart Recorder

VI. Applicable Limits and Compliance Monitoring Requirements

Table VI - B
Applicable Limits and Compliance Monitoring Requirements
S-11 GRAVURE STATION #1 AT COATER #14
S-12 GRAVURE STATION #2 AT COATER #14
S-13 DRYING OVEN #1 AT COATER #14
S-14 DRYING OVEN #2 AT COATER #14
S-15 DRYING OVEN #3 AT COATER #14

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 3	Y		A-2 inlet catalyst cell temperature as established by most recent source test demonstrating compliance	BAAQMD Condition #14373 part 4	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 5	Y		Allowable temperature excursion from A-2 operating temperature limit	BAAQMD Condition #14373 Part 6	P/M	Records of qualifying temperature excursions
HAP	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)(i)	Y		Facility Single HAP usage or emissions < 10 tons per rolling 12-month period	40 CFR Part 63, Subpart KK, Section 63.829(d)	P/M	Coating records
	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)(ii)	Y		Facility Combined HAP usage or emissions < 25 tons per rolling 12-month period	40 CFR Part 63, Subpart KK, Section 63.829(d)	P/M	Coating records

VI. Applicable Limits and Compliance Monitoring Requirements

Table VI - C
Applicable Limits and Compliance Monitoring Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 6.8 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD Condition #1955 Part 1	Y		25% (vol) VOC content	BAAQMD Condition #1955 part 2	P/D	Ink records
VOC	BAAQMD Condition #1955 Part 3	Y		123 lb/day and 20,500 lb/yr	BAAQMD Condition #1955 part 2	P/D	Ink, makeup solvent, & cleanup solvent records
HAP	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)(i)	Y		Facility Single HAP usage or emissions < 10 tons per rolling 12-month period	40 CFR Part 63, Subpart KK, Section 63.829(d)	P/M	Coating records
	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)(ii)	Y		Facility Combined HAP usage or emissions < 25 tons per rolling 12-month period	40 CFR Part 63, Subpart KK, Section 63.829(d)	P/M	Coating records

VI. Applicable Limits and Compliance Monitoring Requirements

Table VI – D
Applicable Limits and Compliance Monitoring Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 part 10b	C	Differential pressure measurement
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
VOC	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 part 10b	C	Differential pressure measurement
	BAAQMD Condition #14373, Part 1(a)	Y		97% (wt) or greater VOC destruction efficiency	BAAQMD Condition #14373 part 4	C	Temperature Chart Recorder
	BAAQMD Condition #14373, Part 3	Y		A-2 inlet catalyst cell temperature as established by most recent source test demonstrating compliance	BAAQMD Condition #14373 part 4	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 5	Y		Allowable temperature excursion from A-2 operating temperature limit	BAAQMD Condition #14373 Part 6	P/M	Records of qualifying temperature excursions

VI. Applicable Limits and Compliance Monitoring Requirements

Table VI – D
Applicable Limits and Compliance Monitoring Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD Condition #14373, Part 8	Y		140 lbs/day and 12.3 tons/yr	BAAQMD Condition #14373, part 7	P/D	Primer, coatings, makeup solvent, & cleanup solvent records
HAP	40 CFR Part 63, Subpart KK, Section 63.820(a)(2) (i)	Y		Facility Single HAP usage or emissions < 10 tons per rolling 12-month period	40 CFR Part 63, Subpart KK, Section 63.829(d)	P/M	Coating records
HAP	40 CFR Part 63, Subpart KK, Section 63.820(a)(2) (ii)	Y		Facility Combined HAP usage or emissions < 25 tons per rolling 12-month period	40 CFR Part 63, Subpart KK, Section 63.829(d)	P/M	Coating records

Table VI – E
Applicable Limits and Compliance Monitoring Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge

VI. Applicable Limits and Compliance Monitoring Requirements

Table VI – E
Applicable Limits and Compliance Monitoring Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #15238, part 8	C	Mechanical interlock system
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD Condition #15238, Part 1	Y		6000 lbs/yr net VOC Usage from waterborne ink and makeup solvent	BAAQMD Condition #15238, part 10	P/M	Waterborne Ink & makeup solvent records
	BAAQMD Condition #15238, Part 2	Y		254,720 lbs/yr net VOC Usage from solventborne ink and makeup solvent	BAAQMD Condition #15238, part 10	P/M	Solvent-borne ink & makeup solvent records
	BAAQMD Condition #15238, Part 3	Y		2,000 lb/yr net waterborne metallic ink usage	BAAQMD Condition #15238, part 10	P/M	Solvent-borne ink & makeup solvent records
	BAAQMD Condition #15238, Part 4	Y		8,000 lbs/yr net organic solvent usage	BAAQMD Condition #15238, part 10	P/M	Solvent-borne ink & makeup solvent records
	BAAQMD Condition #15238, Part 5	Y		39 tons/yr	BAAQMD Condition #15238, part 10	P/M	Ink, makeup solvent, & cleanup solvent records

VI. Applicable Limits and Compliance Monitoring Requirements

Table VI – E
Applicable Limits and Compliance Monitoring Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD Condition #15238, Part 7	Y		75% (wt) or greater overall VOC capture and destruction efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD Condition #15238, Part 7	Y		75% (wt) or greater overall VOC capture and destruction efficiency	BAAQMD Condition #15238, part 8	C	Mechanical interlock system
	BAAQMD Condition #15238, Part 10			1.0 lb VOC/gal of waterborne inks	BAAQMD Condition #15238, Part 11	P/M	Coating records
HAP	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)(i)	Y		Facility Single HAP usage or emissions < 10 tons per rolling 12-month period	40 CFR Part 63, Subpart KK, Section 63.829(d)	P/M	Coating records
	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)(ii)	Y		Facility Combined HAP usage or emissions < 25 tons per rolling 12-month period	40 CFR Part 63, Subpart KK, Section 63.829(d)	P/M	Coating records

VII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally referenced in Section 600 of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

Table VII
Test Methods

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
BAAQMD 8-20-302	Ink and Coating VOC Content Limitations	Manual of Procedures, Volume III, Method 21, “Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings” or Method 22, ““Determination of Compliance of Volatile Organic Compounds for Solvent Based Coating”
SIP 8-20-308	Approved Emission Control System Requirements	Manual of Procedures, Volume IV, ST-7 or EPA Method 25 or 25A
BAAQMD 8-20-309	Cleaning Product Requirements	Manual of Procedures, Volume III, Method 31

VIII. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit.

IX. PERMIT SHIELD

Not Applicable

X. GLOSSARY

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon Monoxide

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District Regulations.

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under

X. Glossary

an EPA-approved program that has been incorporated into the SIP.

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

Major Facility

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAQS

National Ambient Air Quality Standards

NESHAPs

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

X. Glossary

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NO_x, PM₁₀, and SO₂.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Total Particulate Matter

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO₂

Sulfur dioxide

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

VOC

Volatile Organic Compounds

X. Glossary

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m ²	=	square meter
min	=	minute
mm	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

XI. APPLICABLE STATE IMPLEMENTATION PLAN

See Attachments